

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CEMENT MASONS	)	
PENSION FUND, LOCAL 502; TRUSTEES	)	
OF THE CEMENT MASONS INSTITUTE OF	)	
CHICAGO, ILLINOIS; TRUSTEES OF THE	)	
CEMENT MASONS SAVINGS FUND, LOCAL	)	
502; and TRUSTEES OF THE CEMENT MASONS)	)	
APPRENTICE EDUCATION AND TRAINING	)	
FUND, LOCAL 502,	)	
	)	
Plaintiffs	)	
	)	No. 08 C 1366
v.	)	
	)	Judge Shadur
ALKAT CONSTRUCTION SERVICES, INC.,	)	
	)	Magistrate Judge Schenkier
	)	
Defendant.	)	

**NOTICE OF MOTION**

**TO:** ALKAT CONSTRUCTION SERVICES, INC.  
C/O ITS REGISTERED AGENT, EDWARD B. PIERUCCI  
12400 SOUTH HARLEM AVENUE  
PALOS HEIGHTS, IL 60463

**PLEASE TAKE NOTICE** that on **April 14, 2008**, at **9:15 a.m.** or as soon hereafter as Counsel may be heard, I shall appear before the **Honorable Judge Shadur, Room 2303** in the Courtroom usually occupied by her in the Federal District Court, 219 S. Dearborn Street, Chicago, Illinois, and then and there move and present the attached Motion for Order of Default and Audit.

**TRUSTEES OF THE CEMENT  
MASONS PENSION FUND, LOCAL  
502, et. al.**

s/ Donald D. Schwartz  
One of their Attorneys

Donald D. Schwartz  
ARNOLD AND KADJAN  
19 W. Jackson Blvd., Suite 300  
Chicago, IL 60604

**PROOF OF SERVICE**

I hereby certify that I electronically filed this Notice of Motion and Motion for Order of Default and Audit with the Clerk of the Court and a copy will be sent to the above-mentioned at the above-mentioned address and depositing the same, in the U.S. Mail at Jackson & Dearborn, Chicago, Illinois on the 7th day of April 2008, at or before the hour of 5:00 p.m.

ALKAT CONSTRUCTION SERVICES, INC.  
C/O ITS REGISTERED AGENT, EDWARD B. PIERUCCI  
12400 SOUTH HARLEM AVENUE  
PALOS HEIGHTS, IL 60463

s/Donald D. Schwartz  
ARNOLD AND KADJAN  
19 W. Jackson Blvd., Suite 300  
Chicago, IL 60604  
312-236-0415 (phone)  
312-341-0438 (fax)  
Dated: April 7, 2008